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Counsel for Plaintiffs

[Additional Counsel of Record listed on the Signature page]

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

KELLY CAHILL, et al.,

Plaintiffs,

vs.

NIKE, INC., an Oregon Corporation,

Defendant.

Case No. 3:18-cv-01477-JR

**DECLARATION OF BYRON
GOLDSTEIN IN SUPPORT OF
PLAINTIFFS' MOTION FOR LEAVE
TO FILE REPLY IN SUPPORT
PLAINTIFFS' MOTION TO COMPEL
DISCOVERY**

FILED WITH REDACTIONS

I, Byron Goldstein, declare as follows:

1. I am a member in good standing of the Bar of the State of California and a Partner at the law firm of Goldstein Borgen Dardarian & Ho (“GBDH”) in Oakland, California. I was admitted *pro hac vice* to this Court for this action on August 16, 2018. I and co-counsel Markowitz Herbold PC, Ackermann & Tilajef PC, and India Lin Bodien Law represent the Plaintiffs. I am providing this declaration in support of Plaintiffs’ Motion for Leave to File Reply in support of Plaintiffs’ Motion to Compel Discovery. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to them if called upon to do so.

2. Plaintiffs’ counsel reached out to Nike’s counsel by email on October 2, 2023 to meet and confer on Plaintiffs’ request to file a reply. Plaintiffs’ counsel provided the basis for requesting the reply. Plaintiffs’ counsel offered to confer by phone at Nike’s convenience, but Nike never agreed to schedule a meeting. Nike disagrees with Plaintiffs’ bases for seeking a reply.

3. Nike did not provide a position on Plaintiffs’ request for expedited hearing on the motion for leave.

4. A true and correct copy of excerpts from the deposition transcript of [REDACTED], taken by Plaintiffs on September 29, 2023, is attached hereto as Exhibit 1.

I declare under penalty of perjury under that the foregoing is true and correct, and that this Declaration was executed this 4th day of October, 2023 in Oakland, California.

/s/ Byron Goldstein
Byron Goldstein

Exhibit 1
Filed Under Seal